

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Case No. 24-24228-CIV-ALTONAGA

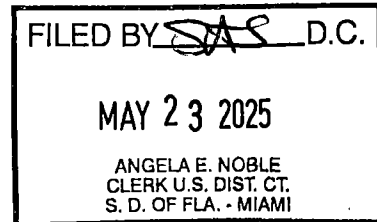
MEGAN PETE, an individual

Plaintiff,

v.

MILAGRO ELIZABETH COOPER,
an individual,

Defendant.



**OPPOSED MOTION TO WITHDRAW AS PRO HAC VICE COUNSEL
BY ATTORNEY MICHAEL HAYDEN, ESQ. (UNITE THE PEOPLE, INC.)
FOR DEFENDANT, MILAGRO ELIZABETH COOPER**

Pursuant to Southern District of Florida Local Rule 11.1(d)(3), and Rule 4-1.16(b) of the Rules Regulating the Florida Bar, Michael R. Hayden, Esq. ("Undersigned Counsel") on behalf of Unite the People, Inc. files a Motion to Withdraw as Pro Hac Vice Counsel of Record for Defendant MILAGRO ELIZABETH COOPER ("Defendant"), and in support states the following:

PRELIMINARY STATEMENT

1. Unite the People Inc. was retained as Pro Bono counsel by Defendant in the above referenced matter to draft and send Cease & Desist letters on behalf of Defendant.
2. Unite the People is unable to secure and retain local Florida counsel for this matter due to financial reasons from both Unite the People Inc. and from Defendant.
3. Due to financial reasons which have arisen by the Defendant and Unite the People Inc., Unite the People Inc. seeks to withdraw from representation of Defendant as Pro Hac Vice counsel in this matter.

Specific Basis for Withdrawal

4. Financial difficulties have arisen with Unite the People Inc. and Defendant, making it unreasonably difficult for Unite the People Inc. to continue to effectively represent Defendant as Pro Hac Vice counsel in this matter, unable to secure local Florida counsel.
5. Defendant is unable to compensate Unite the People Inc. Unite the People Inc. is a non-profit incorporation/firm that specializes in criminal and post-conviction matters, having no dedicated civil litigation department. Unite the People currently has two licensed attorneys, who specialize in criminal law, who handle large caseloads. Without local Florida counsel to act as lead counsel, Unite the People cannot continue to represent Defendant from California or it would suffer extreme financial burden (Likely ruin) and would prejudice current client representation, which is non-profit, heavily discounted services.

Conferral with Counsel for Plaintiff

6. On May 19, 2025, Undersigned Counsel notified counsel for Plaintiff via email of his intention to withdraw as Pro Hac Vice Counsel from this matter, for reasons previously disclosed under seal. Counsel for Plaintiff is opposed to the Motion to Withdraw by Unite the People Inc. However, Unite the People Inc. will not be able to carry out events occurring in California (Depositions, etc.) without being able to secure local Florida Counsel.
7. If the motion for withdrawal of Unite the People Inc. as Defendants Pro Hac Vice counsel is granted, a proposed order will be submitted to the Court under separate cover.

MEMORANDUM OF LAW

Pursuant to Rule 4-1.16(b) of the Rules Regulating the Florida Bar, a lawyer may withdraw from representing client if: “(1) withdrawal can be accomplished without material adverse effect of the interest of the client; (2) the client insists upon taking action that the lawyer considers repugnant, imprudent, or with which the lawyer has a fundamental disagreement; (3) the client fails substantially to fulfill an obligation to the lawyer regarding the lawyer’s services and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled; (4) *the representation will result in an unreasonable financial burden on the lawyer* or has been rendered unreasonably difficult by the client; or (5) other good cause for withdrawal exists.”

Given the financial burdens that have arisen between Unite the People and Defendant, plus the inability to secure and pay local Florida counsel, sufficient good cause exists to permit the withdrawal of Unite the People Inc. as Pro Hac Vice counsel of record for Defendant. Specifically, Defendant and Unite the People Inc. have no means to compensate local Florida counsel. This makes it an unreasonable burden for Unite the People Inc. to continue to represent Defendant.

Based on the foregoing, undersigned counsel respectfully requests that the Court grant the instant Motion in its entirety, entering an order:

- (1) Granting the Motion in its entirety and authorizing Michael R. Hayden, Esquire of Unite the People Inc., to withdraw as Pro Hac Vice counsel of record for Defendant MILAGRO ELIZABETH COOPER, relieving said counsel and Unite the People Inc. of any and all further obligations on behalf of Defendant in this action;

(2) Providing Defendant, MILAGRO ELIZABETH COOPER with a time period deemed sufficient by this Court to retain successor local counsel in Florida or to appear Pro Se; and

(3) Directing all interim pleadings, motions, discovery, and any and all other communications concerning this matter to continue to be sent to Milagro Elizabeth Cooper, Pro Se, 15500 Cutton Rd Apt 4801, Houston Tx 77070-4077

**CERTIFICATE OF COUNFERRAL PURSUANT TO SOUTHERN DISTRICT OF
FLORIDA LOCAL RULE 7.1(3)**

Pursuant to Southern District of Florida Rule 7.1(3) I HEREBY CERTIFY that a good faith effort to resolve the issues by agreement occurred although Plaintiff's counsel has indicated that Plaintiff opposes the relief sought herein.

/s/ Michael R. Hayden, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2025, I mailed the foregoing document to the Clerk of the Court by express mail, since it cannot be e-filed by out of state counsel, without local counsel. I also certify that the foregoing is being served this day on all counsel of record in the manner specified, via email, since it cannot be e-filed by out of state counsel.

By: /s/Michael R. Hayden
Michael R. Hayden
California Bar No. 343302
Appearing Pro Hac Vice

Service List:

Judge Altonaga (via email)
Clerk of the Court (via express mail)
All counsel of Record (via email)
Milagro Elizabeth Cooper (via email)

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ORDER

THIS CAUSE came before the Court upon Defendant's Pro Hac Vice counsel, Michael R. Hayden, of Unite the People Inc.'s Opposed Motion to Withdraw as Local Counsel for Defendant, Milagro Elizabeth Cooper, filed via express mail (Pro Hac Vice). Being fully advised, it is

ORDERED AND ADJUDGED that the Motion is **GRANTED** as follows:

1. By **May 23, 2025**, withdrawing counsel shall send to Plaintiff's counsel a copy of this Order and shall file a notice with the Court certifying same.
2. Defendant's Pro Hac Vice counsel, Michael R. Hayden, Esquire of Unite the People, Inc, is relieved of further responsibility in this case.
3. Defendant, Milagro Elizabeth Cooper, in pro se, will have a reasonable extension of time if she wishes to retain local counsel and new local counsel shall file a notice of appearance.

DONE AND ORDERED in Miami, Florida, this ____ day of May 2025.

CECILIA M. ALTONAGA
CHIEF UNITED STATES DISTRICT JUDGE

Cc: counsel of record



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Mail Services

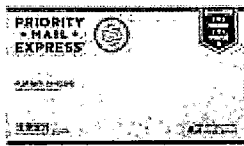
Flat Rate Envelope, mailed on May 22
from LONG BEACH CA 90802 to MIAMI FL 33128



Priority Mail Express 1-Day[®] Flat Rate Envelope

USPS-Produced Envelope: 12-1/2" x 9-1/2"

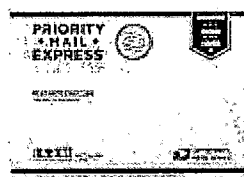
Select a Delivery Option	Scheduled Delivery Day	Retail	Click-N-Ship [®]
Parcel Locker	Fri, May 23 by 6:00 PM	\$31.40	\$27.20
Normal Delivery Time	Fri, May 23 by 6:00 PM	\$31.40	\$27.20
Hold For Pickup	Fri, May 23 by 6:00 PM	\$31.40	\$27.20



Priority Mail Express 1-Day[®] Legal Flat Rate Envelope

USPS-Produced Envelope: 15" x 9-1/2"

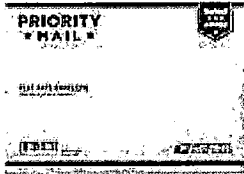
Select a Delivery Option	Scheduled Delivery Day	Retail	Click-N-Ship [®]
Parcel Locker	Fri, May 23 by 6:00 PM	\$31.65	\$27.50
Normal Delivery Time	Fri, May 23 by 6:00 PM	\$31.65	\$27.50
Hold For Pickup	Fri, May 23 by 6:00 PM	\$31.65	\$27.50



Priority Mail Express 1-Day® Padded Flat Rate Envelope

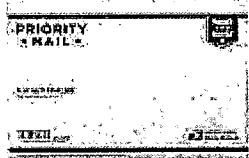
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Parcel Locker	Fri, May 23 by 6:00 PM	\$32.25	\$27.70
Normal Delivery Time	Fri, May 23 by 6:00 PM	\$32.25	\$27.70
Hold For Pickup	Fri, May 23 by 6:00 PM	\$32.25	\$27.70

**Priority Mail Flat Rate® Envelope**

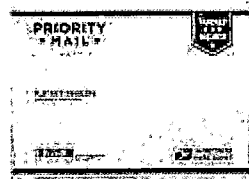
USPS-Produced Envelope: 12-1/2" x 9-1/2"

Select a Delivery Option	Expected Delivery Day	Retail	Click-N-Ship®
Parcel Locker	Tue, May 27	\$10.10	\$8.75
Normal Delivery Time	Tue, May 27	\$10.10	\$8.75
Hold For Pickup	Sun, May 25	\$10.10	\$8.75

**Priority Mail® Legal Flat Rate Envelope**

USPS-Produced Envelope: 15" x 9-1/2"

Select a Delivery Option	Expected Delivery Day	Retail	Click-N-Ship®
Parcel Locker	Tue, May 27	\$10.40	\$9.05
Normal Delivery Time	Tue, May 27	\$10.40	\$9.05
Hold For Pickup	Sun, May 25	\$10.40	\$9.05

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 Unite the People Inc.
 Michael R. Hayden Esq.
 555 E. Ocean Blvd Ste 205
 Long Beach CA 90802

DE: VERY OPTIONS (Customer Use Only)

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Delivery Options

☐ No Saturday Delivery (delivered next business day)
☐ Sunday/Holiday Delivery Required (additional fee, where available)
 *Refer to USPS.com® or local Post Office™ for availability.

TO: (PLEASE PRINT) PHONE 305, 523-5100
 Wilkie D. Ferguson Jr. U.S. Courthouse
 Clerk of the Court
 400 North Miami Ave
 Miami FL 33128

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 CLERK U.S. DIST. CT.
 S. D. OF FLA. - MIAMI



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 Federal Agency Acct. No. or Postal Service™ Acct. No.

ORIGIN (POSTAL SERVICE USE ONLY)

<input checked="" type="checkbox"/> 1-Day	<input type="checkbox"/> 2-Day	<input type="checkbox"/> Mail
PO ZIP Code 90802	Scheduled Delivery Date (MM/DD/YY) 5/23/25	Postage \$
Date Accepted (MM/DD/YY) 5/22/25	Scheduled Delivery Time 6:00 PM	Insurance \$
Time Accepted 2:40	<input type="checkbox"/> AM <input checked="" type="checkbox"/> PM	Return R \$
Special Handling/Fragile \$	Sunday/Holiday Premium Fee \$	Total Pos \$
Weight 0.270	<input type="checkbox"/> Flat Rate	Acceptance Employee Initials [Signature]

DELIVERY (POSTAL SERVICE USE ONLY)

Delivery Attempt (MM/DD/YY)	Time	Employee Signature
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Delivery Attempt (MM/DD/YY)	Time	Employee Signature
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LABEL 1-B, NOVEMBER 2023 PSN 7690-02-000-9996

